

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

Brian David Hill (USWGO)
Plaintiff,

OCT 18 2018

JULIA C. DUDLEY CLARK
BY: *[Signature]*
DEPUTY CLERK

Case no. 7:18-cv-0499

v.

Martinsville City Jail,
Martinsville Police Department,
Defendants

DECLARATION AND OCTOBER
25 STATUS REPORT 2018

I, Brian David Hill (USWGO), the Plaintiff in this case, file statements of facts, subject to the penalties of perjury thereof provide further updates to this case:

(1) Around approximately 5:20AM or 5:30AM this morning or around that time or close to it, Officer Cooper of Martinsville City Jail ("MCJ" or "Jail") had tested my blood sugar and it was in the 100-150 range. Blood sugar testing is for my Type 1 brittle Diabetes. Officer Cooper ("Cooper") said I wasn't going to get any insulin. I told him that breakfast would bring my blood sugar high. He disagreed and told me that it would only go up a little bit. I left feeling like it was an idiotic decision as the morning before I had taken 13 units of Novolog insulin before breakfast which included milk and a honey bun and my blood sugar was in the lower 200 range when the officers thought my blood sugar would go high. The reason my blood sugar

wasn't in the 300s, 400s or 500s, despite the breakfast was with carbs and sugars was because insulin was administered before I had eaten. Yesterdays breakfast consist of a honey bun, a carton of milk, apple sauce, grits or oatmeal, eggs and bacon, as well as a est. 1 and a half cup of juice and coffee with some sugar. I did walk in my cell block for about an hour prior to yesterdays blood sugar being tested after breakfast. Todays blood sugar was tested around ~~approximately~~ approximately 10:27AM and ~~Cooper~~ of MCJ discovered it was 407. It wasn't Cooper who discovered my 407 blood sugar reading but Officer Rumley. I was given 35 units of NovoLog insulin. Todays breakfast was milk, cereal, biscuit with sausage patty, juice, and coffee with some sugar.

See what being given insulin before I eat can do.

200 range v. 407 blood sugar. Cooper failed at Jail.

(2) There were other times when blood sugars were not properly controlled. My outside doctor Shyam Balakrishnan prior to him leaving Carilion Clinic in Martinsville, had me on NovoLog Flexpen and Basaglar (formerly Lantus) insulin on both the sliding scale and insulin-to-carb ratio. 1 unit per 7 or 8 grams of carbohydrates. The Jail doesn't normally give insulin for the meals given but only based on a standard sliding sheet that applies to diabetics, a one size fits all scale. Kind of sheet. This method is flawed and bad for my diabetes. The Jail doesn't consider the carbs and glucose in their calculations, but only based on a one size fits all sliding scale. The Jail simply waits till my blood sugar is high then they react by giving me insulin, for hours my blood sugar stays high. This method is very dangerous.

(3) The Jail's flawed sliding scale formula and failure to administer insulin for the meals I am about to eat put me at high risk of diabetic Ketoacidosis and nerve damage, eye damage, and kidney damage. My body deteriorates the longer I sit in Jail.

(4) It is difficult to secure access to the formal written grievance process, and I have informally raised a grievance regarding issues with Jail policies with some officers. That is the best I could do before I filed this federal lawsuit. Hopefully that should be enough to satisfy any requirements prior to filing a lawsuit.

Roanoke (5) The arresting officer Sgt. R.D. Jones had lied to U.S. Probation Officer Jason McMurray that I had recanted my story. Sgt. Jones works for Martinsville Police Department. I never recanted my story. That alone gives me a high chance of being found not-guilty. So I am wrongfully sitting in Jail while my health deteriorates.

(6) During a shakedown by the officers I asserted to Officer Smith ("Skip") that I had legal papers subject to legal protection, I said that I am going to sue them all. Skip responded by saying out loud "Shut your mouth". His response makes it clear that I will never be able to resolve these issues with the Jail, that a federal lawsuit is necessary because these Jail officers tend to do what they please and disregard the Constitutional rights of their prisoners.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 15, 2018.

Brian D. Hill
Signed

U.S.W.G.O.

Brian David Hill
Martinsville City Jail
P.O. Box 1326
Martinsville, VA 24112

-Certificate Of Service-

I, Brian David Hill, certify that this pleading has been deposited in the institution's mailing on October 15, 2018, directed to the Clerk of the Court, asking that under In Forma Pauperis statute, the Clerk serve this pleading on all parties to this case by U.S. mailing or by Notice of Electronic Filing or by service through U.S. Marshals Service. I ask the Clerk to verify receipt of this pleading by mailing a response letter to Plaintiff.

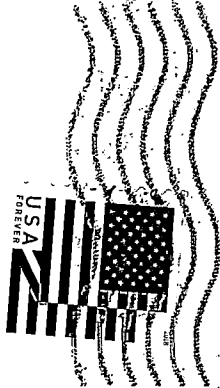
Respectfully filed with this Court, this the 15th day of October, 2018.

Brian D. Hill
Signed

Brian David Hill

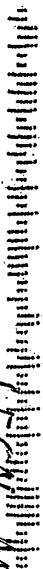
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PIEDMONT TRIAD AREA
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ATTN: Clerk of the Court

U.S. District Court
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LEGAL MAIL